

EXHIBIT A



Order Filed on March 18, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY
COURT**

DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

STEVENS & LEE

Thomas W. Halm, Jr.
100 Lenox Drive, Suite 200
Lawrenceville, New Jersey 08648
Phone: 609-243-6426
Fax: 610-371-7905
Attorneys for Waterfall Victoria Grantor
Trust II, Series G
Our File No. 115201.00036

IN RE:

KEVIN D. TALBERT AND DONNA D.
TALBERT,

Debtors.

Case No. 19-22937 (JNP)
Chapter: 13
Judge: Jerrold N. Poslusny, Jr., USBJ

Recommended Local Form;:

☐ Followed

☒ Modified

CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM AUTOMATIC STAY

The relief set forth on the following page is hereby **ORDERED**.

DATED: March 18, 2022

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

Applicant: Waterfall Victoria Grantor Trust II, Series G
Applicant's Counsel: Thomas W. Halm, Jr., Esq.
Debtor's Counsel: Seymour Wasserstrum, Esq.
Property Involved "(Collateral)": 311 South 4th Street, Vineland, New Jersey 08360
Relief sought: ☒ Motion for relief from the automatic stay
☐ Motion to dismiss
☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is ORDERED that Applicant's Motion is resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- ☒ The Debtor is overdue for 3 months from 1/1/22 through 3/1/22.
☒ The Debtor is overdue for 3 payments at \$860.49 per month.
☐ The Debtor is assessed for _____ late charges at \$_____ per month.
☐ Applicant acknowledges receipt of funds in the amount of \$_____, received after the motion was filed

Total Arrearages Due: \$2,581.47

2. Debtor must cure all post-petition arrearages, as follows:

- ☒ Immediate payment shall be made in the amount of \$860.49. Payment shall be made no later than 3/18/22.
☒ Beginning on 4/1/22 regular monthly mortgage payments shall continue to be made in the amount of \$860.49.
☒ Beginning on 4/1/2020, additional monthly cure payments shall be made in the amount of \$202.04 for one (1) month and \$202.03 for five (5) months.

- ☒ There is currently \$508.79 in suspense. The Secured Creditor shall be entitled to apply the amount in suspense along with the additional monthly cure payments in order to bring the loan current.

3. Payments to the Secured Creditor shall be made to the following address:

☐ Immediate payment: _____

☐ Regular monthly payment: _____

☒ Monthly cure payment: Waterfall Victoria Grantor Trust II, Series G
c/o Statebridge Company, LLC
6061 South Willow Drive, Suite 300
Greenwood Village, CO 80111

4. In the event of Default:

☒ If the Debtor fails to make the immediate payment specified above or fails to make any regular monthly payment or the additional monthly cure payment within fifteen (15) days of the due date, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

☐ If the bankruptcy case is dismissed, or if the automatic stay is vacated, the filing of a new bankruptcy case will not act to impose the automatic stay against the Secured Creditor's opportunity to proceed against its Collateral without further Order of the Court.

5. Award of Attorneys' Fees:

☒ The Applicant is awarded attorney fees of \$500.00 and costs of \$181.00

The fees and costs are payable:

☒ through the Chapter 13 plan.

☐ to the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

I hereby consent to the form and entry
of this Consent Order.

/s/ Thomas W. Halm, Jr.
Thomas W. Halm, Jr., Esq.
Attorney for Secured Creditor
Dated: March 15, 2022

/s/ Seymour Wasserstrum
Seymour Wasserstrum, Esq.
Attorney for Debtor
Dated: March 15, 2022